

## REMARKS

As a preliminary matter, Applicants appreciate the Examiner's continued allowance of claims 2-6 and 9-14.

Claims 19-21 stand rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. More specifically, the Examiner asserts that an electrically insulating bezel enclosing a display panel and the panel-shape module component without disposition of an electrically-conductive frame in front of the display panel is not possessed by Applicants. Applicants respectfully traverse the rejection.

FIG. 13 of the present application shows a bezel 52 and an LCD panel 28 without an electrically-conductive frame in front of a display panel. (See FIG. 13 and the related description in Applicants' specification). For this reason, withdrawal of the §112 rejection of claims 19-21 is respectfully requested.

Claims 7 and 15-16 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Whitscher et al. (U.S. Patent No. 6,144,552) in view of Karasaki (JP 11-167108) and Meisner et al. (U.S. Patent No. 6,005,642). In response, Applicants amended independent claims 7 and 16 to further define the display panel as a "liquid crystal display panel", and respectfully traverse the rejection as it applies to the amended claims because there is no motivation to combine the references.

Meisner discloses a television receiver including a display screen 12 of a color kinescope 40. (See col. 8, lns. 29-31 and col. 10, lns. 53-55). In Meisner, a television

receiver includes a cathode-ray tube (CRT) display device. Meisner is silent regarding a liquid crystal display panel.

In contrast, Whitcher and Karasaki are directed to a liquid crystal display panel. The type of display panel of Meisner is completely different from that of Whitcher and Karasaki, and therefore one skilled in the art would not be motivated to combine the teaching of Meisner with the teachings of Whitcher and Karasaki.

In amended claim 7, the “display panel” is amended to a “liquid crystal display panel” that defines a screen and a front surface. The flat plate frame of the electrically insulating bezel receives the liquid crystal display panel and a panel-shaped module component. The electrically insulating member is coupled with the electrically insulating bezel so as to hold the liquid crystal display panel and the module component against the flat plate frame.

In the rejection, the Examiner asserts that Meisner discloses a display panel module comprising a display panel comprising an electrically insulating bezel 21/29. However, as discussed above, Meisner merely discloses a television receiver including a CRT display device. The CRT of the display device largely extends from the display screen to the rear end of the device. (See FIG. 11 of Meisner). The cabinet 10 comprises the bezel frame 21 and the rear shell 29. The bezel frame 21 and the rear shell are outward covers merely enclosing the CRT. The bezel frame 21 and the rear shell 29 do not hold a liquid crystal display panel and a module component against a flat plate frame, as in the present

invention. Moreover, the electrically insulating bezel and the electrically insulating member of the present invention are not equivalent to the bezel frame 21 and the rear shell 29 of Meisner. Thus, for at least these reasons, the rejection should be withdrawn.

In addition to the above, assuming *arguendo* that a CRT could be considered equivalent to a liquid crystal display panel, as now recited in the amended claims, Applicants traverse the rejection because the suggested combination of the Examiner requires substantial reconstruction or redesign of the references to arrive at the present invention.

Whitcher has a rectangular housing 13 that has a curved lower most portion, as shown in FIGs. 1-3. In FIG. 3, the front housing 15 connects to the rear housing 17, and both of these housings 15 and 17 have a curved portion at their bottom most part. In the Office Action, the Examiner asserts that one would be motivated to modify Whitcher's device by incorporating Karasaki's teachings to prevent removal of the LCD module. However, in order for the metallic frame 1 shown in FIG. 1 of Karasaki to attach to the resin case 3, the frame and case must be rectangular in shape. That is, Karasaki does not teach a housing having a curved contour, as shown in Whitcher. Therefore, substantial reconstruction or redesign would be required to combine the references, and thus there is no motivation to combine the references. For this additional reason, withdrawal of the §103 rejection of claims 7 and 15-16 is respectfully requested.

Claim 17 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Whitcher in view of Howell et al. (U.S. Patent No. 6,353,531 B1) and Meisner. In response,

Applicants amended claim 17 similarly to claim 7, and traverse the rejection because there is no motivation to combine the references.

As discussed above, Meisner is directed to a CRT display, whereas Whitcher and Howell are directed to liquid crystal displays. Therefore, for the reasons recited above, Applicants assert that there is no motivation to combine the references. For this reason, withdrawal of the §103 rejection of claim 17 is respectfully requested.

Claim 18 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Whitcher in view of Karasaki and Meisner, and further in view of either Mishima et al. (U.S. Pub. No. 2001/0033265 A1) or Yamamoto et al. (U.S. Patent No. 5,993,027). Applicants traverse these rejections for the reasons recited above with respect to the rejection of independent claim 7. Similar to Whitcher and Karasaki, Mishima and Yamamoto are directed to liquid crystal displays. However, Meisner is directed to a CRT display, and not a liquid crystal display. Therefore, Applicants assert that there is no motivation to combine the references, contrary to the Examiner's assertion. For this reason, withdrawal of the §103 rejections of claim 18 is respectfully requested.

For all of the foregoing reasons, Applicants submit that this Application is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

GREER, BURNS & CRAIN, LTD.

By

  
Joseph P. Fox  
Registration No. 41,760

March 31, 2006  
300 South Wacker Drive  
Suite 2500  
Chicago, Illinois 60606  
Telephone: (312) 360-0080  
Facsimile: (312) 360-9315  
Customer No. 24978

P:\DOCS\2500165689\A40104.DOC